1	DAVID L. ANDERSON (CABN 149604) United States Attorney		
2 3	HALLIE HOFFMAN (CABN 210020) Chief, Criminal Division		
4	MICHELLE J. KANE (CABN 210579) Assistant United States Attorney		
5	,		
6	1301 Clay Street, Suite 340S Oakland, California 94612 Telephone: (510) 637-3680 FAX: (510) 637-3724 michelle.kane3@usdoj.gov		
7			
8	Attorneys for United States of America		
9	Attorneys for Officer States of Afficier		
10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA		
12	SAN FRANCISCO DIVISION		
13			
14	UNITED STATES OF AMERICA,) No. CR 16-00440 WHA	
15	Plaintiff,	STIPULATION AND [PROPOSED] ORDERADJUSTING CERTAIN PRETRIAL FILING	
16	v.) DATES	
17	YEVGENIY ALEXANDROVICH NIKULIN	,) Trial: March 9, 2020) Pretrial Conference: February 26, 2020	
18	Defendant.) Time: 2:00 p.m.) Courtroom No. 12	
)	
19			
20	Defendant Yevgeniy Nikulin, represented by appointed counsel Adam Gasner and Valery		
21	Nechay, and the United States, represented by Assistant United States Attorney Michelle J. Kane,		
22	hereby stipulate to the following:		
23	1. The Court has set the trial of this matter to begin March 9, 2020;		
24	2. On September 17, 2019, the Co	ourt approved the parties' proposed pretrial schedule (ECF	
25	No. 118);		
26	3. Based on discussions among the parties, and in order to allow full and adequate pretrial		
27	//		
28			
	STIPULATION & [PROPOSED] ORDER CR 16-00440 WHA		

Case 3:16-cr-00440-WHA Document 120 Filed 11/19/19 Page 2 of 2

1	disclosures, the parties have agreed to adjust the deadline for government expert disclosures, exhibit and		
2	witness lists to December 4, 2019. The parties have also agreed to adjust the deadline for Fed. R. Crim.		
3	P. 16 defense reciprocal disclosures, including expert disclosures, and Fed. R. Crim. P. 12.1 and 12.2		
4	defense notices to January 15, 2019;		
5	4. The new dates will not affect the other scheduled pretrial dates nor will they affect the		
6	trial schedule.		
7	IT IS SO STIPULATED.		
8	DATED: November 19, 2019	DAVID L. ANDERSON United States Attorney	
9			
10 11		/s/ MICHELLE J. KANE Assistant United States Attorney	
12		Assistant Office States Attorney	
13		/s/ ADAM GASNER	
14		Counsel for Yevgeniy Alexandrovich Nikulin	
15		NIKUIII	
16		<u>/s/</u> VALERY NECHAY	
17		Counsel for Yevgeniy Alexandrovich Nikulin	
18		ORDER	
19	IT IS SO ORDERED.		
20			
21	Dated:		
22		HON. WILLIAM ALSUP United States District Judge	
23		· ·	
24			
25			
26			
27			
28			
	STIPULATION & [PROPOSED] ORDER		